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September 4, 2014

**VIA ECF**

The Honorable Karen Williams, USMJ  
United States Courthouse  
4<sup>th</sup> and Cooper Streets  
Camden, NJ 08102

**Re: Donald Maddy v. General Electric Co.  
Civ. A. No. 14-490**

Dear Judge Williams:

I write on behalf of Plaintiffs, with Defendant's consent, to request a 90 day extension of the deadlines for filing Plaintiffs' Motion for Class Certification, and Defendant's Opposition thereto. Presently the deadline for Plaintiffs' filing is September 15, 2014, and the deadline for Defendant's filing is October 20, 2014.

While the parties are continuing to work together, additional time is needed to complete discovery related to class certification. Among other things, depositions are being scheduled for individuals who reside in Delaware; Florida; Georgia; Maryland; Massachusetts; Michigan; New Jersey; New York; Pennsylvania; and Rhode Island.

The parties thank the Court for its prompt attention to this matter.

Respectfully submitted,

/s/ Justin L. Swidler  
**SWARTZ SWIDLER, LLC**

cc: Nina Markey, *Counsel for the Defendant* (via ECF)

**SO ORDERED:**

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The Honorable Karen M. Williams, USMJ